

RE-2 Employee Post Travel Disclosure of Travel Expenses

Post Travel Filing Instructions: Complete this form within **30 days** of returning from travel. Submit all forms to the Office of Public Records in 232 Hart Building. **This form is a public disclosure. The form and all attachments will be made publicly available.**

Date/Time Stamp

RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS

2023 MAY 17 PM 5:28

Certification: In compliance with the Regulations Governing Privately Sponsored Travel, Senate Rule 35, and the Honest Leadership and Open Government Act of 2007, I certify that I accepted the following gift of privately sponsored travel:

Private Sponsor(s):

Senate Working Group

Travel Dates:

4/27/2023-4/29/2023

Name of accompanying family member (if any):

Rebecca Burton

Relationship to Traveler:

Spouse

Total Expenses

Transportation Expenses	Lodging Expenses	Meals Expenses	Other Expenses (Amount & Description)
330.12			

I also certify that attached to this form are all required documents for post travel disclosure, including:

- The final **Employee Pre-Travel Authorization** (Form RE-1)
- The final **Private Sponsor Travel Certification Form** with all attachments
- The final invitation
- The final approved itinerary

Finally, I certify that all trip information reflected in the attachments above accurately reflects the travel that I accepted. If there were any changes to the trip after I received approval from the Committee, the changes are described in ATTACHMENT 1.

5/15/23

Date

Larry Burton


Printed Name of Traveler


Signature of Traveler**TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER**

I have made a determination that the expenses set out above in connections with travel described in the Employee Pre-Travel Authorization form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

5/15/23

Date



Signature of Supervising Senator/Officer

Senate Working Group
2023 Senate Republican Chiefs of Staff & Committee Staff Director's Summit
April 27-29, 2023

Thursday, April 27, 2023

Opening Dinner Plenary

7:00 PM - 9:00 PM

Cameo Ballroom

Whether it's the economy or inflation, foreign policy, immigration, or government accountability, the group will hear from Governor Jim Justice of West Virginia and former Speaker of the House Newt Gingrich as they kick off the start to the Summit and share their thoughts on the current state of affairs and ways we can achieve a brighter future for the American people.

The Honorable **Jim Justice**, Governor, West Virginia

The Honorable **Newt Gingrich**, 50th Speaker of the United States House of Representatives

Friday, April 28, 2023

Breakfast Plenary

9:00 AM - 11:30 AM

Crystal Ballroom

Broken into two separate panel discussions, the group will hear from policy experts from various prominent think-tanks discussing government accountability and foreign policy, specifically the U.S. – China relationship. The first panel will be 60 minutes (30-minute discussion + 30-minute Q&A). The second panel will be 90 minutes (45-minute discussion + 45-minute Q&A).

Government Accountability

Matt Weidinger, Senior Fellow and Rowe Scholar, American Enterprise Institute

Kurt Couchman, Senior Fellow, Fiscal Policy, Americans for Prosperity

Mike Howell, Director, Oversight Project, The Heritage Foundation

Moderator: **Jennifer Heins**, Chief of Staff, Senator Chuck Grassley (R-IA)

Foreign Policy & China

Klon Kitchen, Nonresident Senior Fellow, American Enterprise Institute

Dr. Miles Yu, Director, China Center at the Hudson Institute & former China Advisor to U.S. Secretary of State Mike Pompeo

Morgan Ortagus, Founder of Polaris National Security & former Spokesperson for the U.S. Department of State

Moderator: **Matt Miltenberger**, Chief of Staff, Senator Pete Ricketts (R-NE)

Lunch Plenary**12:30 PM - 2:00 PM***Chesapeake Ballroom*

As newer Chiefs to the Senate with recently elected Senators, the purpose of this discussion is to share their experience transitioning into the role, sharing the differences between this role and their previous roles (i.e., House Chief of Staff, Legislative Director, or within the private sector), and the challenges or opportunities they see in the Senate, given their fresh perspective.

Clay Armentrout, Chief of Staff, Senator Katie Britt (R-AL)

Benjamin Cantrell, Chief of Staff, Senator MarkWayne Mullin (R-OK)

Tucker Knott, Chief of Staff, Senator Ted Budd (R-NC) (invited)

Jimmy Peacock, Chief of Staff, Senator Eric Schmitt (R-MO)

Moderator: **Brent Robertson**, Chief of Staff, Senator Roger Marshall (R-KS)

Afternoon Session**3:30 PM - 5:00 PM***Crystal Ballroom*

A deep dive discussion into the issues and how they are being received at home. Featuring national pollsters, Ryan Munce of co/efficient and Travis Smith of Creative Direct, they will share their findings and showcase the trends amongst Americans. They will not discuss elections or campaign related content but will do a national deep dive into the issues that are important to Americans and how those issues may have changed or will continue to change.

Ryan Munce, co/efficient

Travis Smith, Creative Direct

Dinner Plenary**7:00 PM - 9:00 PM***Chesapeake Ballroom*

The dinner will feature a keynote lecture and conversation with former Secretary of State Mike Pompeo, who will discuss America's role in the world along with the growing threat from China. This session will begin with a 30-minute networking reception, followed by a 90-minute discussion and Q&A with Secretary Pompeo.

The Honorable **Mike Pompeo**, 70th United States Secretary of State

Saturday, April 29, 2023**Breakfast Plenary****9:00 AM - 11:00 AM***Crystal Ballroom*

Broken into two separate panel discussions, the group will hear from policy experts from various prominent think-tanks discussing the economy and inflation and a second panel on immigration & border security. Each panel will be broken down into 60-minute segments, giving each panel 45 minutes to introduce and discuss the issue, then will leave 15 or more minutes to take questions from the audience.

Economy/ Inflation

Dr. Michael Strain, Director of Economic Policy Studies & Arthur F. Burns Scholar in Political Economy, American Enterprise Institute

Marc Marie, Regulatory Policy Fellow, Americans for Prosperity

EJ Antoni, Research Fellow, Regional Economics, Center for Data Analysis, The Heritage Foundation

The Honorable **Dr. Michael Faulkender**, Chief Economist, America First Policy Institute & former Assistant Secretary for Economic Policy at the U.S. Department of the Treasury

Moderator: **Allyson Bell**, Chief of Staff, Senator Mike Lee (R-UT)

Immigration & Border Security

Director **Thomas Homan**, former Acting Director of the U.S. Immigration and Customs Enforcement & Visiting Fellow, Border Security and Immigration Center, The Heritage Foundation

The Honorable **Chad Wolf**, former Acting U.S. Secretary of Homeland Security, Executive Director, America First Policy Institute & Chair, Center for Homeland Security & Immigration, America First Policy Institute

Moderator: **Sean Riley**, Chief of Staff, Senator Ron Johnson (R-WI)

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Summit Concludes

RE-1 Employee Pre-Travel Authorization

Date/Time Stamp

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics in SH-220**. Incomplete and late travel submissions will not be considered or approved.

Name of Traveler:

Larry Burton

Employing Office/Committee:

SULLIVAN, DAN

Private Sponsor(s):

Senate Working Group

Destination(s):

Greenbrier Resort 101 Main Street West White Sulphur Springs, West Virginia 24986

Travel Dates:

04/27/2023 to 04/29/2023

NOTE: If you plan to extend the trip for any reason you **must** notify the Committee.

Explain how this trip is specifically connected to the traveler's official or representational duties.

This conference provides peer group and external group learning on policy topics and best practices beneficial for carrying out my official role.

Do you have an accompanying family member or spouse on this trip?

Yes

Name and Relationship to Traveler:

Rebecca Burton (Spouse)

I certify that the information contained in this form is true, complete and correct to the best of my knowledge.

03/20/2023

Date

Dan Sullivan

Signature of Employee

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER

(President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain)

Dan Sullivan

(Print Senator's/Officer's Name)

hereby authorize

Larry Burton

(Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate.

☒ (signify "yes" by checking box)

03/20/2023

Date

Dan Sullivan

Signature of Supervising Senator/Officer

CHRISTOPHER A. COONS, DELAWARE, CHAIRMAN
JAMES LANKFORD, OKLAHOMA, VICE CHAIRMAN

BRIAN SCHATZ, HAWAII
JEANNE SHAHEEN, NEW HAMPSHIRE

JAMES E. RISCH, IDAHO
DEB FISCHER, NEBRASKA

SHANNON HAMILTON KOPPLIN, CHIEF COUNSEL AND STAFF DIRECTOR
WILLIAM B. CABLE, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220
SECOND AND CONSTITUTION AVENUE, NE
WASHINGTON, DC 20510-6425

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United States Senate

SELECT COMMITTEE ON ETHICS

April 20, 2023

Larry Burton
Office of Senator Dan Sullivan
United States Senate
Washington, DC 20510

Dear Mr. Burton:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you and your spouse received to travel to the *2023 Senate Republican Chiefs of Staff & Committee Staff Director's Summit* in White Sulphur Springs, West Virginia, on April 27–29, 2023, sponsored by Senate Working Group. Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from Senate Working Group in connection with this trip.

Background

Based on your communication with the Committee, the background in this matter is as follows.¹ You are employed as the chief of staff for the Office of Senator Dan Sullivan. Senate Working Group invited you and your spouse to travel to *2023 Senate Republican Chiefs of Staff & Committee Staff Director's Summit* in White Sulphur Springs, West Virginia, on April 27–29, 2023. Senate Working Group certified to the Committee that it will pay the necessary expenses² related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. Senate Working Group has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist or agent of a foreign principal will accompany you at any point throughout your trip.³

Discussion

Privately sponsored travel includes any gift of travel and travel-related expenses for travel outside the Senate duty station, including transportation, lodging, food and refreshments, and conference fees and materials, whether paid for directly, reimbursed, or provided directly, from a private individual or entity, in connection with a Member's, officer's, or employee's official Senate duties. Incorporating reforms from the Honest Leadership and Open Government

¹ If this letter does not correctly recite the facts, contact the Committee immediately.

² The term “necessary expenses” has a specific definition. *See Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel – Glossary of Terms* at 8.

³ The term “any point throughout your trip” has a specific definition. *See id.* at 2.

Act of 2007 (HLOGA), Pub. L. 110–81 (2007), Senate Rule 35.2 permits Members, officers, and employees to accept privately sponsored travel only with the prior written approval of the Committee.

The Committee's approval process is governed by the *Regulations and Guidelines for Privately Sponsored Travel and Glossary of Terms* (collectively, *Travel Regulations*). The *Travel Regulations* contain detailed requirements regarding who may sponsor travel; time limits for trips; and the type and amount of expenses that can be reimbursed.

Entities that do not retain or employ a lobbyist or foreign agent and all non-profit organizations designated as tax-exempt organizations under § 501(c)(3) of the Internal Revenue Code of 1986, regardless of whether they retain or employ a lobbyist or foreign agent, may sponsor domestic trips for up to three days. The three-day limitation means three 24-hour periods, calculated from the time of arrival in the trip location to the time of departure from the trip location. For such trips, neither lobbyists nor foreign agents may accompany a Senate invitee at any point throughout the trip, other than in a *de minimis* way.⁴ This means that neither lobbyists nor foreign agents may accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited.⁵

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately Sponsored Travel.**

Consistent with these standards and Committee precedent, and Senate Working Group's factual representations, it appears that it is permissible for you to accept necessary expenses from Senate Working Group in connection with this trip, provided that the actual travel and travel-related expenses conform to the information and materials you provided, and the travel and all required documents are disclosed to the Secretary of the Senate (Office of Public Records). Necessary expenses may include travel expenses for the spouse of a Senate employee if the supervising Member determines that the attendance of the spouse is appropriate to assist in the representation of the Senate.

Finally, Senate Rule 34 requires a reporting individual⁶ on their financial disclosure report, to make an annual disclosure of the receipt of payments or reimbursements under Senate

⁴ The term "*de minimis*" has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel – Glossary of Terms* at 3.

⁵ See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 5; see also *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel – Glossary of Terms* at 2-3.

⁶ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$141,022 for CY 2023) or is a political fund designee and is required to file financial disclosure reports.

Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$480 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their financial disclosure report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Shannon Hamilton Kopplin
Chief Counsel and Staff Director

Enclosure: Travel Checklist